

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

BRUCE WILLIAMS

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

CITY OF NEW YORK
PO. AMADEE JEAN LOUIS
OF 114 PRECINCT QUEENS

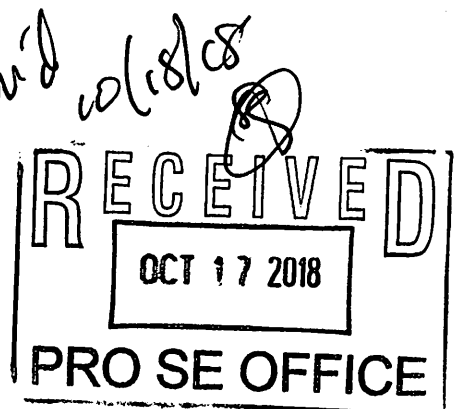
(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Complaint for Violation of Civil Rights

(Non-Prisoner Complaint)

AMENDED COMPLAINT
Case No. 18 CV-921 ENV
(to be filled in by the Clerk's Office) J-O

Jury Trial: ☒ Yes ☐ No
(check one)



NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed *in forma pauperis*.

①

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Bruce Williams</u>
Street Address	<u>35-29 crescent ST</u>
City and County	<u>Long Island City Queens</u>
State and Zip Code	<u>New York 11106</u>
Telephone Number	<u>347 738 6745</u>
E-mail Address	<u></u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	<u>CITY OF New York</u>
Job or Title (if known)	<u>C/O Comptroller Scott Stanger</u>
Street Address	<u>1 Centre St. Room 1125</u>
City and County	<u>New York City, New York county</u>
State and Zip Code	<u>New York 10007</u>
Telephone Number	<u></u>
E-mail Address (if known)	<u></u>

Defendant No. 2

Name

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address
(if known)

~~1~~ AMADÉE JEAN-LOUIS
POLICE OFFICER 114 precinct
1 POLICE PLAZA
NEW YORK CITY NEW YORK COUNTY
NEW YORK 10038
646 610 5000

Defendant No. 3

Name

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address
(if known)

Defendant No. 4

Name

Job or Title
(if known)

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address
(if known)

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☒ State or local officials (a § 1983 claim)
☐ Federal officials (a *Bivens* claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

SEE ATTACHED PAGE 1

C. ~~Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?~~

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

SEE ATTACHED PAGE 1

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

1 F O 35-29 crescent ST
LIC NY 11106

B. What date and approximate time did the events giving rise to your claim(s) occur?

NOVEMBER 10 2015 7:30 A.M.

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)

SEE ATTACHED PAGE

(2)

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

SEE ATTACHED
PAGE
(3)

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

SEE ATTACHED PAGE
(4)

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: OCTOBER 17, 2018

Signature of Plaintiff Bre Na

Printed Name of Plaintiff BRE WILLIAMS

ATTACHED PAGE 1

BASIS FOR JURISDICTION

B

First amendment right to free speech and right to take photographs in public. 13th amendment violation since the officers were not punished for their crimes and are free to do to plaintiff as they please, plaintiff's status is reduced to chattel, detained and caged with no legal reason to do so on many occasions

D

There were 3 previous encounters with Officer Louis where plaintiff was punished for exercising his free speech rights

First time 6/5/08 only plaintiff had my ID taken despite the fact that Officer Louis and his partner were checking to see if plaintiff and associate were burglars. When plaintiff spoke up, only his ID was checked.

On the second occasion, Officer Louis was present with 2 other officers when plaintiff attempted to tell of an actual burglar. One of the officers assaulted and cursed him while Officer Louis said nothing and didn't report it.

On the third occasion, Officer Louis saw plaintiff taking his picture during what looked to be a suspicious stop and frisk from a block away.

On the fourth occasion, November 10, 2015 he was called to arrest plaintiff. in docket # 2015QN055893 At the stationhouse a visitor asked to see him but Lieutenant Kim told him no. "He's known to the department for taking pictures and saying bad things."

Officer Louis testified falsely about many things while under oath to get revenge, as did Garcia in what looked to be a concerted effort to jail me in revenge for previous slights. Disrespecting his dog is what a neighbor who stopped the attack testified at the criminal trial that Garcia had told him when asked.

Acting together plaintiff was arrested by Officer Louis whose partner took the pictures of Garcia which is not what was testified to by Garcia. The city allows this by making it impossible to bring charges and Officer Louis used his authority to arrest me for revenge, using Garcia's false statements to do so.

Docket # 2015QN055893 in Queens County NY 11/10/2015 IFO 35-29 Crescent Street. at 7:30AM

ATTACHED PAGE 2

STATEMENT OF CLAIM

At 7:30 A.M. on November 10 2015, was passing my house on November 11, 2015 and made an intimidating face at plaintiff. As plaintiff was returning to his house, walking in the opposite direction, Garcia ran back to plaintiff's residence and assaulted him, sitting on top of plaintiff for more than five minutes.

His roommate came by and spoke with him but didn't do anything despite plaintiff asking for help. Two persons passing by made 911 calls to report plaintiff was being assaulted. When the ambulance came they wanted plaintiff to agree to a cat scan which was declined. Plaintiff was so bruised he was made to wear gloves to get in the ambulance for treatment.

Garcia was mad plaintiff refused to pet his dog for ten minutes every time he walked it as well as being furious that plaintiff wasn't happy Garcia's dog urinated on a chained up bicycle while plaintiff was watching.

After that Garcia harassed plaintiff at every opportunity including making remarks about plaintiff's wife as she passed him in the street. .

He told the neighbors plaintiff pepper sprayed his dog and when nobody cared he changed that to taking pictures of his child thru his window as he testified in court but video evidence contradicts that.

Officer Louis testified under oath that he arrived a minute and a half after the first unit, which was a Housing Bureau unit. Video evidence contradicts that. He made many other false statements under oath such as the origins of my shoes and jacket said to be given by him.

This filing is poorly written and the plaintiff acknowledges that, having been abandoned by the Bar Association running the Pro se office without hearing even the smallest amount of details, not looking at any videos which were crucial to the defense in the criminal case. They made threats of penalties if this wasn't taken to state court but the people being accused have influence there as stated in a previous case in Federal Court

This complaint is forty years in the making, this new incident is just the latest in a series that have never had a complaint taken, so the plaintiff, acting on his own is now in Federal Court because there is nowhere else to go. .

Suing for damages is the only venue left and it only gives the taxpayer his own money, none will come from the offenders nor will they be punished.

ATTACHED PAGE (3)

INJURIES

Garcia slammed plaintiff's head into the ground and was about to crack open his skull when he was stopped by kicking out at him, hitting his nose.

This was an attempted murder as plaintiff feels that one more blow to the head would have split it open, possibly causing death or serious injury. Made to wear gloves to get into the ambulance because of the severity of the injuries, a cat scan was demanded but refused by plaintiff who was able to stop the attack before permanent injury could occur.

ATTACHED
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RELIEF

The \$75 million figure quote in the original complaint will reduced to \$25 million since two of the offending parties have been placed out of reach of this lawsuit.

A large portion of the money will be used to make sure that complaints are heard and taken. Also, relief in the form of a complaint being taken by competent law enforcement should it be shown that perjury was committed while under oath in the Federal Court if said happens.